

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HEATHER L. EASON,	:
	:
Plaintiff,	:
	:
-against-	: 08 Civ. 3557 (SCR)
	:
GP AVIATION SERVICES, LLC	:
and EAST WEST FLIGHT, LLC,	:
	:
Defendants.	:
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**PLAINTIFF HEATHER EASON’S FIRST SET  
OF INTERROGATORIES TO DEFENDANTS**

S I R S:

PLEASE TAKE NOTICE that plaintiff, HEATHER EASON, by and through counsel, BAKER, LESHKO, SALINE & BLOSSER, LLP and pursuant to FRCP 33, requests the defendants GP Aviation Services, LLC and East West Flight, LLC respond to the following interrogatories in accordance with the FRCP.

**INSTRUCTIONS AND DEFINITIONS**

- A. These interrogatories are continuing in character so as to require you to file supplemental answers if you, your attorneys, investigators, agents,

before trial.

- B. Where the name or identity of a person is requested, please state the full name, home address, and business address, if known.
- C. Unless otherwise indicated, these interrogatories refer to the times, places and circumstances of the occurrences mentioned or complained of in Plaintiff's complaint.
- D. Where knowledge or information in possession of a party is requested, such request includes knowledge of a party's agents, representatives and, unless privileged, his/her attorneys.
- E. "DOCUMENT" includes the original and any non-identical copy (whether different from the original because of notes made on such copy or otherwise) of all written, typed, printed, recorded, or graphic matter of every type and description, whether draft or final, however, and by whomever prepared, produced, reproduced, disseminated, or made, in any form, including, but not limited to, all writings, correspondence, e-mails, bulletins, instructions, charts, literature, work assignments, contracts, agreements, notes, notebooks, microfilm, photographs, tapes, pamphlets, data sheets, statistics, minutes of meetings, letters, memoranda, reports, transcripts of telephone conversations, summaries, books, diaries, sound recordings, data compilations from which information can be obtained or can be translated through detection devices into reasonably usable form, and all other documentary material of any nature whatsoever, together with any attachments thereto or enclosures therewith.

(I) Identify and generally describe each such document; and

(II) State the basis upon which the privilege is claimed..

F. "PERSON," means the plural as well as the singular and includes any natural person and any firm, corporation, association, joint venture, partnership or other entity.

G. "IDENTIFY," means:

(I) when referring to a natural person or persons, state the full name, age, address of last known residence and principal place of business of each such person , and a description of their business affiliation and position during the period to which the interrogatory refers;

(II) when used with reference to a business organization or entity, state the full name of such organization or entity, the address of its principal place of business and a description of the nature of the business during the period to which the interrogatory refers;

(III) when used with reference to a document, state:

(a) the type of document, its date and the stated subject matter or general subject matter;

(b) the full name, address, and position of the person in charge of preparing each such document and of the person who signed each such document;

(c) the date or dates of preparation thereof;

whom such written matter was distributed; and

(IV) when used with reference to an oral discussion, conversation or communication, state the date upon which the discussion, conversation or communication occurred, the place where it occurred, identify each person who participated therein or who was present when it was made, state its substance and identify each document which, in whole or in part, refers to said oral, communication.

H. Whenever an interrogatory asks for the identity of any document, you may, in lieu of identifying the document, produce the document for inspection and copying with an identification of the interrogatory to which the document responds.

I. Where information is requested which is personal to, or within the sole knowledge of, one person, provide the information requested, and indicate which person the information is personal to, or within the sole knowledge of. If personal to more than one person, or within the knowledge of more than one person, provide the answer requested, identifying the information pertaining to each such person, or to each such person's knowledge.

J. "OR" and "AND" shall mean "AND/OR."

K. Singular shall refer to the plural and plural to the singular whenever applicable.

“INCIDENT” as used hereinafter in these interrogatories shall refer to the facts alleging liability of the defendants as set forth in the Plaintiff’s Complaint.

M. “YOU” or “YOUR” includes the Defendant.

**INTERROGATORY NO. 1:**

Please state:

- (a) The name and address of the person or persons answering these interrogatories;
- (b) His/her relationship to defendant; and,
- (c) His/her position of employment.

**ANSWER:**

If Defendants have not been sued in their correct name(s), state their correct name(s).

**ANSWER:**

Are you aware of any statement made by the plaintiff, defendants or any representatives, regarding the occurrence and/or Incident mentioned in the Complaint, whether oral, written or recorded in any way, including but not limited to, a stenographic, mechanical, electrical, audio, video, motion picture, photograph, or other recording, or transcription thereof, and if so, state the following:

- (a) Date, place, and time taken;
- (b) Name and address of the person or persons connected with taking it;
- (c) Names and addresses of all persons present at the time it was taken;
- (d) Whether the statement was oral, written, shorthand, recorded, taped, etc.

**ANSWER:**

State whether there exists photographs, videotapes, or movies with respect to the

Incident referenced in the complaint. If so, state the following:

(a) Describe each photograph, video, or movie;

(b) State the date each was taken;

(c) State the name and address of the person taking each such photo, video, or

movie; and

(d) State the name and address, employer, insurer, and job title of the person

presently having control or custody of each photograph, video, or movie.

**ANSWER:**

Experts: List and identify:

(i) Name;

(ii) Address;

(iii) Occupation;

(iv) place of employment;

(v) Qualifications to give an opinion ( if such information is available on an

experts curriculum vitae, you may attach a copy thereof in lieu of answering this

interrogatory subpart); and,

(vi) with respect to each expert listed, please state the subject matter on

which the expert is expected to testify and the expert's hourly deposition fee.

**ANSWER:**

Witnesses: State the names and addresses of every person known by the defendants, defendants' representatives or defendants' attorney, to have witnessed any facts in connection with the Incident. Designate which of such people actually claim to have witnessed the facts in connection with the Incident, or has any knowledge of the matters set forth in the Complaint including, but not limited to, the ownership of the aircraft in question and any arrangements for the use thereof between East West Aircraft, LLC and GP Aviation, LLC.

**ANSWER:**

Please state whether or not any insurance company ( including any company with excess or umbrella coverage ) has an interest in the outcome of this litigation against the defendants. If so, state the following:

- (a) The name of the insurance company;
- (b) Whether the insurance company is a stock company or mutual company;
- (c) Name of the insured;
- (d) Type(s) of insurance;
- (e) Effective policy period;
- (f) Policy number; and,
- (g) Limits of the policy applicable to the occurrence mentioned in the Complaint.

**ANSWER:**

Please Identify the owner of the aircraft on which Plaintiff was injured which is the subject matter this action. Upon information and belief, the aircraft bears tail number (registration number) N778MT.

**ANSWER:**

Please describe the business arrangement between GP Aviation Services, LLC and East West Flight, LLC, including, but not limited to whether or not (1) there was a lease between the two defendants regarding the use and/or possession and/or right to fly of the subject aircraft, (2) whether or not such arrangement was exclusive and (3) if there was a lease (or similar arrangement) between the two defendants, the length of such lease (or similar arrangement).

**ANSWER:**

Was the subject aircraft on the date of the accident involving Plaintiff being flown with the permission of the owner thereof?

**ANSWER:**

Please Identify the pilot, co-pilot and any other persons known to be on board the subject aircraft on the day and at the time of the incident alleged in the complaint.

**ANSWER:**

Yours, etc.

BAKER, LESHKO, SALINE & BLOSSER, LLP  
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By: 

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